

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

ERIN WILSON, individually and on behalf of all others similarly situated,	:	CIVIL ACTION FILE NO. 25-
	:	cv-3237
Plaintiff,	:	
	:	
v.	:	
	:	
COOKUNITY LLC	:	
	:	
Defendant.	:	
	:	

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**PLAINTIFF’S UNOPPOSED MOTION TO ENLARGE HIS BRIEF BY TEN  
PAGES IN OPPOSITION TO THE DEFENDANT’S MOTION TO DISMISS**

Plaintiff respectfully moves for leave to file an Opposition to Defendant’s Motion to Dismiss not to exceed thirty-five (35) pages, i.e., ten (10) pages beyond the twenty-five (25) page limit set by LR 7.1(D). Good cause exists, and no party will be prejudiced.

Local Rule 7.1(D) limits principal briefs to 25 pages absent prior permission of the Court. Plaintiff seeks such permission for the Opposition only.

Despite diligent editing, Plaintiff does not believe he cannot responsibly present the issues within 25 pages because the motion raises interlocking questions that require targeted but adequate treatment, including: (i) whether texts are “calls” under § 227(c) given the “call or message” definition, same-term/same-meaning

across § 227(b)/(c), and the statute’s privacy purpose; (ii) post-*McLaughlin* framing of agency interpretations; (iii) the FCC’s long-standing implementation and 2023–24 codifications; (iv) congressional ratification (TRACED Act); (v) cellular telephones are residential.

The request is modest and confined to this brief. Defendant may respond within the existing limits or seek comparable relief. Granting this motion promotes efficient adjudication by allowing a clean, consolidated presentation without piecemeal supplemental briefing.

On September 12, 2025, Plaintiff’s counsel met and conferred with Defendant’s counsel, who does not oppose the requested relief. Plaintiff respectfully requests leave to file an Opposition to the Motion to Dismiss not to exceed 35 pages. All other formatting requirements of LR 7.1 will be observed.

Date: September 11, 2025

/s/ Anthony Paronich

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